

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
LEE COUNTY, ILLINOIS

ROBERT ALLEN, )  
Plaintiff, ) 2022LA00007  
v. ) Case No. 22 - L  
VERIZON, )  
Defendants. )

SUMMONS

TO EACH DEFENDANT: Verizon, 1684 S Galena Ave, Dixon, IL 61021

KC3 YOU ARE HEREBY SUMMONED and required to file an answer in this case or otherwise file your appearance, in the Office of the Circuit Clerk, LaSalle County Court House, 119 W. Madison St Rm 201, Ottawa, IL 61350 within 30 days after service of this summons, not counting the day of service.

IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp>, or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your Circuit Clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

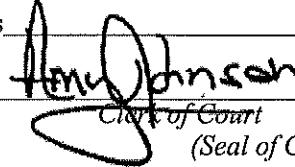
If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local Circuit Clerk's office for a fee waiver application.

To the Officer, Lee County Sheriff, 240 E Progress Dr, Dixon, IL 61021

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than three (3) days before the date of appearance. This summons may not be served later than thirty (30) days after its date.

5/6/2022

Witness

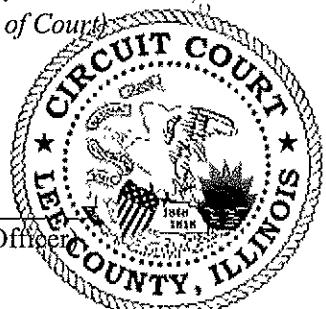
 AHB  
Clerk of Court  
(Seal of Court)

Attorney Travis Dunn; ARDC # 6319131  
LAW OFFICES OF PETER F. FERRACUTI, P.C.  
Attorney for Plaintiff  
110 East Main St, Ottawa, IL 61350  
Phone: 815/434-3535; Fax: 815/434-4513

Date of

Service

(To be inserted by the Officer)



FILED  
Lee Co. Circuit Court  
15th Judicial Circuit  
Date: 5/6/2022 11:23 AM  
Amy Johnson  
AHB

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
LEE COUNTY, ILLINOIS

ROBERT ALLEN, )  
Plaintiff, ) 2022LA00007  
v. ) Case No. 22 - L -  
VERIZON, )  
Defendants. )

COMPLAINT AT LAW

NOW COMES the Plaintiff, ROBERT ALLEN ("Plaintiff"), by and through his attorneys, THE LAW OFFICES OF PETER F. FERRACUTI, P.C., and for his Complaint against the Defendant, VERIZON ("Defendant"), states and alleges as follows:

PARTIES

1. Plaintiff is, and was at all times relevant hereto, a resident of the county of LaSalle, Illinois.
2. Defendant is a company conducting business at all times relevant to this complaint at a storefront, the address of which was 1684 South Galena Avenue in the city of Dixon, county of Lee, state of Illinois.

VENUE

3. Venue is proper within this Judicial Circuit because the primary actions and events that have given rise to the controversy occurred in Lee County, Illinois. 735 ILCS 5/2-

101.

30

6

2

**FACTS COMMON TO ALL COUNTS**

4. Plaintiff was employed by the Defendant as a salesperson on May 8, 2020, and for approximately 5 years prior thereto.

5. In the course of his job duties, Plaintiff was criticized several times by employees and agents of the defendant MICHAEL BAKER and MONICA CHASE in connection with racially charged incidents between customers of the Defendant and the Plaintiff.

6. That in February of 2020, a Human Resources representative of Verizon corporate held a meeting with employees of the Dixon store of the Defendant.

7. That in the course of this meeting, the Human Resources representative invited questions in a group setting with employees of the store.

8. That when the Plaintiff requested information and clarification on how best to handle racially charged incidents with customers, the Human Resources representative refused to provide guidance.

9. That, at the aforementioned time and place, the Human Resources representative assured the Plaintiff that they would follow up with him to provide further information.

10. That the Plaintiff had reasonable belief that the above-described behavior of Defendant in handling the racial incidents violated the laws of the State of Illinois.

11. That on May 8, 2020 the Plaintiff was terminated from his employment with the Defendant.

12. That the Defendant claimed that the Plaintiff was being terminated due to having improperly utilized his employee account for discounts for family members.

13. That despite this claim, several other employees of the Defendant, including SHELLY YOLANDO and MICHAEL STEFFENS,

14. That the Defendant had instituted policies and guidance against harassment, bullying, and discrimination.

15. That the proximity between the Plaintiff's reports of harassment, intimidation, and fear for his safety and the termination of the Plaintiff indicates that the Plaintiff was discharged by the defendant from his employment as a direct result of his reports.

16. That the pretextual nature of the reasoning for terminating the Plaintiff lends support to the position that he was terminated in retaliation for his protected activities.

**COUNT I:**

**WRONGFUL TERMINATION**

17. Plaintiff restates and fully incorporates into Count I his allegations set forth in Paragraphs 1 through 16, above.

18. Plaintiff's good faith reports of customer behavior, as described above, were activities protected by virtue of their being reports of potentially criminal misconduct.

19. That both the criminal and civil code of the State of Illinois establish a clearly mandated public policy against racial harassment.

20. That there is no public policy more basic or more implicit in the concept of ordered liberty than the enforcement of a State's criminal code. See *Palmateer v. Int'l Harvester Co.*, 85 Ill. 2d 124, 132 (1981).

21. That the Plaintiff reported customer's behavior to the Defendant.

22. That such reports of potential criminal misconduct were protected by clearly mandated public policy. See *Nason v. Rockford Park Dist.*, 2014 IL App (2d) 130364-U, ¶ 21.

23. That the proximity in time between the reports of the Plaintiff and his unjustifiable termination raise the inference that the reports resulted in his termination.

24. Defendants' termination of Plaintiff's employment therefore was an illegal retaliatory discharge in violation of a clearly mandated public policy.

25. As a direct and proximate result of Defendants' illegal retaliatory termination of his employment as described above, Plaintiff has lost income in the form of wages, social security and other benefits, and has suffered emotional pain, mental anguish, loss of enjoyment of life, and other non-pecuniary losses, and he is expected to incur future damages.

**WHEREFORE**, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

**COUNT II**

**INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

26. Plaintiff realleges and incorporates paragraphs 1-25 as and for paragraph 26.

27. At all times relevant hereto, Defendant was aware of the harassing and threatening conduct of customers towards the Plaintiff.

28. Furthermore, Defendant was aware of the emotional distress the harassing conduct was causing the Plaintiff.

29. Nevertheless, Defendant failed and refused to provide any remedy to the Plaintiff, and instead continued to allow him to be subjected to the harassing conduct of customers.

30. Furthermore, Defendant terminated the Plaintiff, knowing full well that the incidents had already been causing him severe emotional distress.

31. Defendant acted with a reckless or conscious disregard of the certainty that its

actions and omissions would cause the Plaintiff severe emotional distress.

32. The actions of the Defendant, in failing to protect the Plaintiff with knowledge that the harassment was causing him severe emotional distress were therefore extreme and outrageous, and regarded as intolerable in a civilized society.

33. As a direct and proximate result of Defendant's acts and omissions, the Plaintiff did sustain such extreme emotional distress that no reasonable person should be expected to endure it.

34. Therefore, the Defendant is liable to the Plaintiff for intentional infliction of severe emotional distress.

WHEREFORE, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

Respectfully submitted,

Robert Allen, Plaintiff  
BY: LAW OFFICES OF PETER F. FERRACUTI,  
P.C.

By: Travis Dunn  
Travis Dunn, Attorney for Plaintiff

Travis Dunn  
Attorney Number: 6319131  
Law Offices of Peter F. Ferracuti  
110 E. Main St., Ottawa, IL 61350  
P (815) 434-3535  
F (815) 434-2796  
tdunn@peterferracuti.com



## Lee County Circuit Court



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Case Status
Civil Case
Civil Hearings
Judges
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Old Financial History
ROA

## CIVIL CASE STATUS SUMMARY ▶ 2022LA00007 Robert Allen vs. Verizon CASE STATUS ▶ Pending - May 6, 2022

DATE ▾

05/06/2022 12:00 AM

CASE STATUS

Pending

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Page 1 of 1 (1 items)

REFRESH

CANCEL



## Lee County Circuit Court



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CASE LOOKUP 2022 LA 00007 RETRIEVE

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Civil Hearings
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Judgment/Orders
Old Financial History
ROA

## CIVIL CASE ▶ 2022LA00007 Robert Allen vs. Verizon

CASE STATUS ▶ Pending - May 6, 2022

## CASE INFORMATION

JUDGE ▶ Lee, Douglas E  
 PROSECUTOR ▶  
 CASE SUBTYPE ▶ Tort - Money Damages  
 FILE LOCATION ▶ \*\*\*\*\*  
 REMAND DATE ▶  
 DOM. VIOLENCE ▶ \*  
 JURISDICTION ▶ Circuit  
 PHYSICAL FILE ▶ \*  
 SEALED ▶ \*  
 NEXT HEARING ▶ 10/04/2022 01:30 PM-CH-L-  
                   F Progress Call  
 BATCH LABEL ▶   
 COMPLEX CASE ▶   
 EXCEPTIONAL CASE ▶   
 COMMENT ▶ \*\*\*\*\*

APPELLATE CASE NO. ▶  
 LOCATION ▶  
 FILING DATE ▶ 05/06/2022  
 APPEAL DATE ▶  
 APPEAL ACCEPTED DATE ▶  
 APPEAL UPHELD DATE ▶  
 UNDER ADVISEMENT DATE ▶ \*\*\*\*\*  
 PREVIOUS CASE NO. ▶ \*\*\*\*\*  
 OTHER AGENCY CASE NO. ▶  
 JURY REQUESTED ▶   
 JURY VERDICT ▶   
 CLASS ACTION ▶

## LITIGANTS

1 - 2 of 2

SEL	LITIGANT	STATUS	ROLE▲	ATTORNEY	CASE RELATIONSHIP
<input type="checkbox"/>	Allen, Robert		Plaintiff	Dunn, Travis	N
<input type="checkbox"/>	Verizon		Defendant		N



## Lee County Circuit Court



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CIVIL CASE
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Civil Hearings
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**CIVIL HEARING SUMMARY** ▶ 2022LA00007 Robert Allen vs. Verizon      **CASE STATUS** ▶ Pending - May 6, 2022

CONTINUANCE ONLY

1 - 1 of 1

HEARING TYPE	JUDGE	COURT ROOM	START DATE▲	RESULT
CH-L-F Progress Call	Douglas E Lee	410	10/04/2022 - 01:30 PM	<input type="button"/> PARTICIPANTS <input type="button"/> OFFICERS

REFRESH  CANCEL



## Lee County Circuit Court



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CIVIL JUDGES ▶ 2022LA00007 CASE STATUS ▶ Pending - May 6, 2022

*JUDGE	*FROM	TO	SEND NOTICES	DEPARTMENT	REASON FOR REMOVAL
Lee, Douglas E	05/06/2022	*	*		*****



## Lee County Circuit Court



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CIVIL CASE	▼
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## CIVIL JUDGMENT/ORDER SUMMARY ▶ 2022LA00007 Robert Allen vs. Verizon CASE STATUS ▶ Pending - May 6, 2022

SEL JUDGMENT/ORDER TYPE FILING DATE ORDER DATE STATUS

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## Lee County Circuit Court



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CIVIL CASE ▾

- Case Status
- Civil Case
- Civil Hearings
- Judges
- Judgment/Orders
- Old Financial History
- ROA

## CIVIL OLD FINANCIAL HISTORY ▶ 2022LA00007

CASE STATUS ▶ Pending - May 6, 2022

## BALANCES

CASE BALANCE ▶ 0.00  
BOND BALANCE ▶ 0.00  
TRUST BALANCE ▶ 0.00



## Lee County Circuit Court



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ROA

## CIVIL ROA SUMMARY · 2022LA00007 · Robert Allen vs. Verizon

CASE STATUS · Pending - May 6, 2022

Advanced Search

SORT DATE ▶  Ascending  Descending

1 - 7 of 7

<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ * Next Appearance: CH-L-F Progress Call , October 4, 2022 at 1:30 PM in Courtroom 410 with Judge Douglas E Lee.	*JUDGE ▶ Lee, Douglas E CODE ▶ CT HRST CV	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Appearance filed by Attorney Travis Dunn, for Robert Allen.	*JUDGE ▶ Lee, Douglas E CODE ▶ CT ATTO	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Complaint at Law: filed by Attorney Travis Dunn	*JUDGE ▶ Lee, Douglas E CODE ▶ ACTION	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Issued Summons for service on Verizon, service by Attorney.	*JUDGE ▶ Lee, Douglas E CODE ▶ SM ALIA	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Progress Call Notice filed - copy submitted to atty by email.	*JUDGE ▶ No Judge CODE ▶ PR CAL	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Receipt Amount: \$306.00 Receipt #: 924559	*JUDGE ▶ Lee, Douglas E CODE ▶ ACTION SHERIFF	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>
<input type="checkbox"/>	*DATE ▶ 05/06/2022 SEALED ▶ <input type="checkbox"/> *TEXT ▶ Tort - Money Damages (LA) filed by Allen, Robert. Receipt Amount: \$306.00 Receipt #: 924559	*JUDGE ▶ Lee, Douglas E CODE ▶ ACTION RECEIPT	MICROFILM NUMBER ▶ <input type="text"/> ACTION TYPE ▶ <input type="button" value="▼"/>

1 - 7 of 7

LIST

REFRESH

CANCEL

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
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ROBERT ALLEN, )  
Plaintiff, ) 2022LA00007  
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Defendants. )

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1. Plaintiff is, and was at all times relevant hereto, a resident of the county of LaSalle, Illinois.
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3. Venue is proper within this Judicial Circuit because the primary actions and events that have given rise to the controversy occurred in Lee County, Illinois. 735 ILCS 5/2-101.

**FACTS COMMON TO ALL COUNTS**

4. Plaintiff was employed by the Defendant as a salesperson on May 8, 2020, and for approximately 5 years prior thereto.

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**COUNT I:**

**WRONGFUL TERMINATION**

17. Plaintiff restates and fully incorporates into Count I his allegations set forth in Paragraphs 1 through 16, above.

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20. That there is no public policy more basic or more implicit in the concept of ordered liberty than the enforcement of a State's criminal code. See *Palmateer v. Int'l Harvester Co.*, 85 Ill. 2d 124, 132 (1981).

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**WHEREFORE**, Plaintiff, ROBERT ALLEN, respectfully prays that he may have judgment against the Defendant, VERIZON, in an amount in excess of the jurisdictional limits of this Court, and other such relief as this Court shall deem appropriate, and additionally, costs of this action.

## COUNT II

### **INTENTIONAL INFILCTION OF EMOTIONAL DISTRESS**

26. Plaintiff realleges and incorporates paragraphs 1-25 as and for paragraph 26.

27. At all times relevant hereto, Defendant was aware of the harassing and threatening conduct of customers towards the Plaintiff.

28. Furthermore, Defendant was aware of the emotional distress the harassing conduct was causing the Plaintiff.

29. Nevertheless, Defendant failed and refused to provide any remedy to the Plaintiff, and instead continued to allow him to be subjected to the harassing conduct of customers.

30. Furthermore, Defendant terminated the Plaintiff, knowing full well that the incidents had already been causing him severe emotional distress.

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32. The actions of the Defendant, in failing to protect the Plaintiff with knowledge that the harassment was causing him severe emotional distress were therefore extreme and outrageous, and regarded as intolerable in a civilized society.

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Respectfully submitted,

Robert Allen, Plaintiff  
BY: LAW OFFICES OF PETER F. FERRACUTI,  
P.C.

By: \_\_\_\_\_ /Travis Dunn  
Travis Dunn, Attorney for Plaintiff

Travis Dunn  
Attorney Number: 6319131  
Law Offices of Peter F. Ferracuti  
110 E. Main St., Ottawa, IL 61350  
P (815) 434-3535  
F (815) 434-2796  
tdunn@peterferracuti.com

**IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
LEE COUNTY, ILLINOIS**

ROBERT ALLEN, )  
                        )  
Plaintiff,         ) 2022LA00007  
                        )  
v.                    ) Case No. 22 - L  
                        )  
VERIZON,            )  
                        )  
Defendants.        )

**SUMMONS**

**TO EACH DEFENDANT: Verizon, 1684 S Galena Ave, Dixon, IL 61021**

**YOU ARE HEREBY SUMMONED and required to file an answer in this case or otherwise file your appearance, in the Office of the Circuit Clerk, LaSalle County Court House, 119 W. Madison St Rm 201, Ottawa, IL 61350 within 30 days after service of this summons, not counting the day of service.**

**IF YOU FAIL TO DO SO, A JUDGMENT BY DEFAULT MAY BE ENTERED AGAINST YOU FOR THE RELIEF ASKED IN THE COMPLAINT.**

E-filing is now mandatory with limited exemptions. To e-file, you must first create an account with an e-filing service provider. Visit <http://efile.illinoiscourts.gov/service-providers.htm> to learn more and to select a service provider. If you need additional help or have trouble e-filing, visit <http://www.illinoiscourts.gov/faq/gethelp.asp>, or talk with your local circuit clerk's office. If you cannot e-file, you may be able to get an exemption that allows you to file in-person or by mail. Ask your Circuit Clerk for more information or visit [www.illinoislegalaid.org](http://www.illinoislegalaid.org).

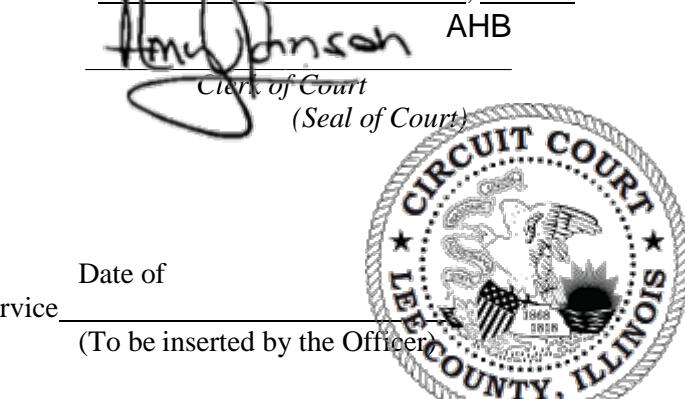
If you are unable to pay your court fees, you can apply for a fee waiver. For information about defending yourself in a court case (including filing an appearance or fee waiver), or to apply for free legal help, go to [www.illinoislegalaid.org](http://www.illinoislegalaid.org). You can also ask your local Circuit Clerk's office for a fee waiver application.

**To the Officer:**      **Lee County Sheriff, 240 E Progress Dr, Dixon, IL 61021**

This summons must be returned by the officer or other person to whom it was given for service, with indorsement of service and fees, if any, immediately after service. If service cannot be made, this summons shall be returned so indorsed. This summons may not be served later than three (3) days before the date of appearance. This summons may not be served later than thirty (30) days after its date.

5/6/2022

Witness \_\_\_\_\_, \_\_\_\_\_



Attorney Travis Dunn; ARDC # 6319131  
LAW OFFICES OF PETER F. FERRACUTI, P.C.  
Attorney for: Plaintiff  
110 East Main St, Ottawa, IL 61350  
Phone: 815/434-3535; Fax: 815/434-4513

Date of

Service \_\_\_\_\_

(To be inserted by the Officer)

**SHERIFF'S FEES**

Service and Return	\$ _____
Miles	\$ _____
<b>TOTAL</b>	\$ _____

Sheriff of \_\_\_\_\_ County

I certify that I served this summons on defendant as follows:

(a) **(Individual defendants - personal):**

By leaving a copy and a copy of the complaint with each individual defendant personally as follows:

Name of Defendant	Date of Service
_____	_____
_____	_____

(b) **(Individual defendants - abode):**

By leaving a copy and a copy of the complaint at the usual abode of each individual defendant with a person of his family, of age 13 years or upwards, informing that person of the contents of the summons, and also by sending a copy of the summons and of the complaint in a sealed envelope with postage fully prepaid, addressed to each individual defendant at his/her usual place of abode, as follows:

Name of Defendant	Person with Whom Left	Date of Service	Date of Mailing
_____	_____	_____	_____
_____	_____	_____	_____

(c) **(Corporation or Defendants):**

By leaving a copy and a copy of the complaint with the registered agent, officer or agent of each defendant corporation, as follows:

Defendant Corporation	Registered Agent Officer or Agent	Date of Service
_____	_____	_____
_____	_____	_____

(d) **(Other Service):**\_\_\_\_\_  
\_\_\_\_\_Sheriff of \_\_\_\_\_ County  
By \_\_\_\_\_

**State of Illinois  
In the Circuit Court of the 15<sup>th</sup> Judicial Circuit  
Lee County**

**Robert Allen vs. Verizon**

**Case Number: 2022LA00007**

*FILED*  
5 MAY 06 2022 5  
*Amy Johnson*  
BY *Lee County Circuit Clerk*

**Progress Call Notice**

This case is set for a progress call on the **4th day of October 2022**, at **1:30 PM** in courtroom **410**, located at **309 South Galena Avenue, Dixon, IL 61021**. All parties or their counsel are to be present before the Court at this call. Failure to appear may result in dismissal or default.

Lee County Circuit Clerk

Amy Johnson

Appearance

(12/30/15) CCL N530

IN THE CIRCUIT COURT OF THE FIFTEENTH JUDICIAL CIRCUIT  
LEE COUNTY, ILLINOIS

FILED

Lee Co. Circuit Court

15th Judicial Circuit

Date: 6/22/2022 2:16 PM

Amy Johnson

AHB

ROBERT ALLEN, )  
Plaintiff, )  
v. )  
VERIZON, )  
Defendant. )

Case No. 2022LA00007

**APPEARANCE**

GENERAL APPEARANCE

0900 - APPEARANCE - FEE PAID; 0909 - APPEARANCE - NO FEE;  
0904 APPEARANCE FILED - FEE WAIVED

JURY DEMAND

1900 - APPEARANCE & JURY DEMAND - FEE PAID  
1909 - APPEARANCE & JURY DEMAND - NO FEE

The undersigned enters the appearance of:

Plaintiff

Defendants

VERIZON

(Insert litigant's name.)

s/ Sean C. Herring and James C. Goodfellow

Signature

INITIAL COUNSEL OF RECORD  
ADDITIONAL APPEARANCE

PRO SE  
SUBSTITUTE APPEARANCE

A copy of this appearance shall be given to all parties who have appeared and have not been found by the Court to be in default.

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**Pro Se Only:** I have read and agree to the terms of the Clerk's Office Electronic Notice Policy and choose to opt in to electronic notice from the Clerk's office for this case at this email address

**CERTIFICATE OF SERVICE**

I, the undersigned attorney, hereby certify that on June 22, 2022, I caused a true and correct copy of the foregoing *Appearance* to be filed with the Court's Electronic Filing System, and that same will therefore be served upon all counsel of record.

/s/ Sean C. Herring \_\_\_\_\_